

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

DAVID E. MACK,)
v.)
Plaintiff,)
v.)
MIDLAND CREDIT MANAGEMENT,)
INC.,)
Defendant.)
CIVIL ACTION NO.
4:14-cv-414-RAS-DBB

STIPULATED MOTION FOR ENTRY OF PROTECTIVE ORDER

COME NOW the Plaintiff and Defendant, by and through their undersigned counsel, and as their Stipulated Motion for Entry of Protective Order, state and allege as follows:

Pursuant to stipulation of the parties and in accordance with the provisions of Fed. R. Civ. Proc. 26(c),

1. In an effort to facilitate the exchange of confidential documents through formal discovery, the parties hereby tender a Proposed Agreed Protective Order to the Court.

2. A copy of the Proposed Agreed Protective Order is attached hereto as Exhibit 1.

WHEREFORE, the parties respectfully request that this Court enter the attached proposed Agreed Protective Order as an Order of this Court.

Respectfully submitted this 18th day of December, 2014.

/s/David E. Mack (with permission)
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/s/ Reid S. Manley

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